

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

UNITED STATES OF AMERICA

38

No. 1:18-CR-00120

V.

33

33

JESSE WILZE TILLMAN

۲۸۳

ELEMENTS OF THE OFFENSE

You are charged in Count One of the information with violating 18 U.S.C. § 2252(a)(4)(B), and 18 U.S.C. 2252(b)(2), possession of material involving the sexual exploitation of minors. The essential elements which must be proven to establish a violation of this offense are as follows.

1. The Defendant knowingly possessed one or more matters which contained any visual depiction of a minor engaged in sexually explicit conduct; and
 2. Such visual depiction had been mailed, shipped, or transported in interstate or foreign commerce, by any means, including by computer, or was produced using materials which had been so mailed, shipped, or transported; and
 3. That the production the visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct; and
 4. The Defendant knew that the visual depiction involved the use of a minor engaging in sexually explicit conduct.

Respectfully submitted,

**JOSEPH D. BROWN
UNITED STATES ATTORNEY**

/s/ Christopher Tortorice

CHRISTOPHER TORTORICE
Assistant United States Attorney

Texas Bar No. 24048912
350 Magnolia, Suite 150
Beaumont, Texas 77701
(409) 839-2538
(409) 839-2550 (fax)
email: chris.tortorice@usdoj.gov

CERTIFICATE OF SERVICE

I certify that the foregoing instrument was served on counsel of record via the Court's CM/ECF filing system on this the 12th day of December 2018.

/s/ Christopher Tortorice
CHRISTOPHER TORTORICE
Assistant United States Attorney